

UNITED STATES BANKRUPTCY COURT  
Eastern District of New York

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In Re: Alevtina Dick

Debtor, discharged 6/14/2011

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Chapter 7

Case No.11-41682 (NHL)

CLERK  
U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF  
NEW YORK

2013 DEC -2 P 1:35

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**REPLY TO TRUSTEE'S RESPONSE DATED NOVEMBER 26, 2013**

1. I, Alevtina Dick acknowledges the fact that I filed for Bankruptcy protection.
2. I, Alevtina Dick acknowledges that Robert L. Geltzer was appointed trustee, but does not agree that he is now qualified and acting as such trustee. I believe the Bankruptcy proceedings were finalized upon my discharge and then subsequent cancellation of the Bankruptcy 2004 Examination.
3. I, Alevtina Dick cannot validate the information contained within this paragraph, since it is nearly three years since my discharge. In addition, I have only received the trustee's response as of Friday, December 29, 2013. My letter of October 23, 2013 to which he is now responding was delivered to him 30 days ago. It appears that the trustee's Response was motivated by my husband's Letter of November 21, 2013 to the Court.
4. I, Alevtina Dick was not involved in any car accident, my husband sustained physical, mental and financial injury.
5. I, Alevtina Dick have no recollection of the information contained herein, since it is almost three (3) years ago.

6. I, Alevtina Dick had no knowledge that my husband's attorneys were giving information protected by the attorney client privilege to the trustee.

7. I, Alevtina Dick, had no knowledge that my husband's attorneys were giving information protected by the attorney client privilege to the trustee.

8. I, Alevtina Dick, had no knowledge that my husband's attorneys were giving information protected by the attorney client privilege to the trustee.

9. I, Alevtina Dick, had no knowledge that my husband's attorneys were giving information protected by the attorney client privilege to the trustee.

10. I, Alevtina Dick, have no knowledge of the facts stated therein, only that my husband and I retained the Law Firm of Dinkes and Schwitzer, for reasons they are fully aware of, but are protected by the attorney client privilege.

11. I, Alevtina Dick, have no knowledge of the facts stated herein, and refer back to my answer in Paragraph 10., above.

12. I, Alevtina Dick, have no knowledge of the statements as contained within this Paragraph.

13. I, Alevtina Dick, have no knowledge of the statements as contained herein, excepting for the fact I did not operate a business called "Leslie Worldwide Ltd.".

14. I, Alevtina Dick, agree that my Attorney moved for an Order to Withdraw, but do not recall my response to said motion, in that, it was nearly two (2) years ago. In addition, I refer to my answer in Paragraph 3, herein.

15. I, Alevtina Dick, have no comment as to the truth or falseness of such statement. The Bankruptcy File and the Documents therein are a matter of public record.

16. I, Alevtina Dick, do recall that the Honorable Judge Nancy Hershey Lord, extended the time for me to appear at 2004 Examination; which the trustee unilaterally cancelled abruptly, and then never rescheduled, since that time, which is over 18 months ago.

17.) I, Alevtina Dick, acknowledge the facts as previously stated above in Paragraph 16, with the exception to the fact that my statements were erroneous. In fact, it now appears that the trustee is in error.

18. I, Alevtina Dick, disagree with the majority of the information as contained within this Paragraph. It is true that I received my discharge on June 14, 2011.

19. I, Alevtina Dick, have no knowledge of the facts stated therein, excepting for the fact that I now am aware of the violations of Law and Ethics, that have been perpetrated by the trustee and our former attorneys Joseph Campisi and Mordecai T. Schwartz for their own financial gain.

20.) I, Alevtina Dick, cannot understand what the trustee and my former attorney Joseph Campisi have been doing for the last 2-3 years, without my knowledge and rely on this Honorable Court to ascertain the true set of facts, as stated within this Paragraph. I have no writing from either my former attorneys requesting me to waive my attorney client privilege, nor has the trustee ever indicated to me that he "retained Joseph Campisi as his special injury counsel". In fact, Joseph Campisi never told me that he was not my attorney during that time period.

21.) In conclusion, as previously stated in my letter of October 23, 2013, the only document in "my" legal file was a retainer agreement to the best of my knowledge and belief. My deposition was never taken, and as stated previously the file being withheld is my husbands.

**Wherefore**, I would respectfully request the following relief;

A.) That the trustee Robert L. Geltzer be ordered to return immediately the confidential and privileged information he illegally has in his possession both prior and after the Order of November 6, 2013, issued by the Supreme Court Judge, and that said Order of November 6, 2013, be declared null and void.

B.) That the trustee Robert L. Geltzer, testify under oath as to the true nature of the improper conversations that he had with my former attorneys, Campisi and Schwartz, and the Supreme Court Judge.

C.) That the trustee Robert L. Geltzer, be Sanctioned in the amount the Court deems just and proper, under the circumstances.

Note: Alevtina Dick with help has expended over 50 hours in having the Law researched, analyzed and reviewing all the documents; and preparing 2 Letters with attachments, and the Request For Investigation & Criminal Indictment. My salary is \$75. Per case hour, and spent 15 hours, total amount, \$1,125.00. A relative of my husband spent 35 hours, on my behalf, and his Consultant Rate is \$1,000. Per hour, for a total cost of \$36,125.00. plus the legal fees and costs expended by Dinkes and Schwitzer; at least 15 hours plus the \$250. Filing fee .

D.) That an Order be entered by this Honorable Court declaring my Bankruptcy final and complete in its entirety.

E.) That an Order be entered directing both the trustee and my former attorneys Joseph Campisi and Mordecai T. Schwartz to turn over both my, and my husband's legal and medical file to Dinkes and Schwitzer; William Schwitzer and William R. Hamel.

Dated: December 1, 2013

  
Alevtina Dick